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5 Attorney for Defendant JOEL DOMINGUEZ

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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA

No. CR 17-CR-00375-JST

11 Plaintiff,

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND SURRENDER  
DATE**

12 v.

13 JOEL DOMINGUEZ,

14 Defendants.  
15 \_\_\_\_\_/

16  
17 When defendant Joel Dominguez was sentenced on October 26, 2018, the Court set a  
18 surrender date of January 4, 2019 for Mr. Dominguez to serve his four year sentence with the  
19 Bureau of Prisons. The parties hereby stipulate and agree that the surrender date for Mr.  
20 Dominguez can be extended BY ONE MONTH to February 4, 2019.

21 The reason for the requested extension of the surrender date for Mr. Dominguez is so that  
22 counsel for Mr. Dominguez, Robert Waggener, can research and address the Bureau of Prisons  
23 designation for Mr. Dominguez which was received on December 31, 2018. By an email on  
24 December 31, 2018 to Mr. Waggener, Pearline Jackson, Administrative Support Assistant for the  
25 United States Marshals Service attached the designation for Mr. Dominguez, asking that Mr.  
26 Dominguez be notified of the date and location where he had been designated. The attached  
27 designation for Mr. Dominguez was that he surrender on January 4, 2019 at McKean SCP, a  
28 Satellite Camp Prison somewhere in Pennsylvania.

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND SURRENDER DATE**

1 When the Court sentenced Mr. Dominguez it recommended to the Bureau of Prisons "that  
2 the defendant be housed in a facility as close to the San Francisco Bay Area as possible, in order  
3 to facilitate family visitation." (Dkt. No. 60, page 2) With this newly received designation, Mr.  
4 Dominguez is being asked to surrender in four days over three thousand miles away from his  
5 family. It is fully recognized that the Court can only make housing recommendation to the  
6 Bureau of Prisons. However, an extension of the surrender date is being requested here by  
7 defense counsel in order to investigate an alternative designation, and in order to have a dialogue  
8 with representatives of the Bureau of Prisons and/or the United States Marshals Service about  
9 housing Mr. Dominguez closer to his family and young son. Assistant United States Attorney  
10 Sailaja M. Paidipaty and United States Probation Officer Brian Casai have no objection to an  
11 extension of the surrender date for Mr. Dominguez.

12 **SO STIPULATED**

13  
14 Dated: December 31, 2018

\_\_\_\_\_/s/  
ROBERT WAGGENER  
Counsel for Joel Dominguez

15  
16  
17 Dated: December 31, 2018

\_\_\_\_\_/s/  
Sailaja M. Paidipaty  
Assistant United States Attorney

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19  
20 **~~{PROPOSED}~~ ORDER**

21 For the reasons stated above, the Court **ORDERS** that the surrender date for defendant  
22 Dominguez is extended from January 4, 2019, such that defendant shall now surrender for  
23 service of sentence at the institution designated by the Bureau of Prisons by 12:00 p.m. on  
24 February 4, 2019.

25 Dated: January 2, 2019

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\_\_\_\_\_  
HONORABLE JON S. UGAR  
United States District Court Judge